

SA:KLK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

15M 766

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960))

MICHELLE STEWART,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

SCOTT SALAMON, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about August 13, 2015, within the Eastern District of New York and elsewhere, the defendant MICHELLE STEWART did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and belief are as follows:¹

1. On or about August 13, 2015, the defendant MICHELLE STEWART arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Delta Airlines flight 718 from Montego Bay, Jamaica.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. The defendant MICHELLE STEWART was selected for a Customs and Border Protection ("CBP") examination. STEWART acknowledged ownership of her bags and their contents and stated that her boyfriend added some items to her bag. CBP officers conducted an examination of the bags and discovered a black and white striped pocketbook with unusually thick panels that felt unusually heavy.

3. The defendant MICHELLE STEWART was escorted to a private examination area where the lining of the pocketbook was cut open. Two packages were found inside and one of the packages was probed. A white powdery substance was extracted, which field-tested positive for the presence of cocaine. STEWART was placed under arrest.

4. The total approximate gross weight of the cocaine recovered from the black and white striped pocketbook was 989.1 grams.

WHEREFORE, your deponent respectfully requests that defendant MICHELLE STEWART be dealt with according to law.


SCOTT SALAMON
Special Agent
Homeland Security Investigations

Sworn to before me on
the 14th day of August, 2015


THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK